

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

Litchfield Financial Corporation, )  
Textron Financial Corporation, )  
Land Finance Company )

Plaintiffs, )

v. )

AFFIDAVIT OF  
WILLIAM GREGORY SEIGLER

Buyers Source Rreal Estate Group, )  
Buyers Source Valley Group, LLC, )  
Buyers Source Sugarmill, LLC, )  
Buyers Source, Savannah Lakes, LLC, )  
Thomas H. Brewer, Frederick D. Blake, )  
Betty M. Brewer, Susan Gard, Henry )  
Montgomery, Lannie Campbell, Ronald P. )  
Ferguson, Stephen A. Hudgins, Esq., )  
Stephen A. Hudgins, P.C., Hudgins & )  
Stallings, P.C., J. Vance Stallings, Esq., )  
John C. Lumpkin, Esq., John C. Lumpkin, )  
P.C., William Gregory Seigler, Esq., )

Defendants )

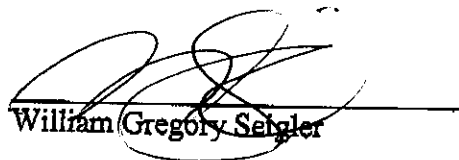
PERSONALLY APPEARED before me, William Gregory Seigler, who being duly  
sworn Deposes and states as follows:

1. I am William Gregory Seigler and I reside at 39 Buffalo Creek, McCormick, South Carolina;
2. In connection with the legal work I performed in South Carolina relative to real property in a development called Savannah Lakes in McCormick County, I signed a number of

letters on my professional letterhead addressed to Land Finance Company in Williamstown, MA. Copies of a few such letters were attached to the pending Motion to Dismiss Or In The Alternative To Stay;

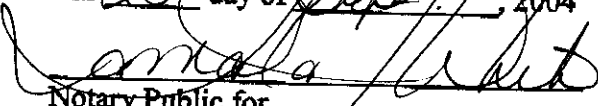
3. My best recollection is that a number of such letters were physically deposited for mailing by my office personnel or picked up for delivery at my office;
4. It would not, therefore, be correct to state that I never sent correspondence to the Commonwealth of Massachusetts in connection with the legal work referenced in paragraph 2, above;
5. That factual misstatement as found in the Memorandum In Support of Defendant William Gregory Seigler's Motion To Dismiss was the inadvertent result of a misunderstanding between myself and local counsel in South Carolina, and I know of no revisions which need to be made to my affidavit of August 13, 2004, a copy of which was attached to my Motion to Dismiss Or In The Alternative To Stay.

FURTHER AFFLIANT SAYETH NOT:

  
William Gregory Seigler

SWORN to and subscribed before me

this 23<sup>rd</sup> day of Sept., 2004

  
Notary Public for

My Commission Expires: 10-1-06